

REMARKS

Referring to paragraphs 1 and 2 of the Action, the specification has been amended as suggested by the Examiner.

Turning to paragraphs 4-6 of the Action, the claims have been amended to correct the noted informalities and to otherwise clarify the claims. All claims now conform to 35 U.S.C. 112.

Claims 1-45 are in the application of which claims 11, 20-22, 33 and 42-44 are indicated as containing allowable subject matter.

Referring to paragraph 7 of the action, Applicant requests reconsideration of the rejection of independent claims 1, 23 and 45 and certain claims dependent thereon as being anticipated by Higgins et al '643.

Applicant's system, data communicated with sources external to primary and secondary telecom switches are received or transmitted by the passive I/O board of the primary telecom switch. The secondary telecom switch, on the other hand, may only communicate to external sources through a redundancy connection to the passive I/O board of the primary telecom switch. In the event that the active processing board of the primary telecom switch should become unavailable, the passive I/O board of the primary telecom switch still remains available. Then, the secondary telecom switch assumes control of operations and utilizes the redundancy connection with the passive I/O board of the primary telecom switch to communicate with the external sources. In other words, when the active processing board of the primary telecom switch becomes inactivated or unavail-

able, the comparable board of the secondary telecom switch takes over and communicates with the bearer traffic network via the redundancy connection and the passive I/O board of the primary telecom switch. The primary thrust of the invention as above is expressed in the last clauses of independent claims 1, 23 and 45.

Thus, beginning a line 14 of claim, it is stated that:

“wherein said secondary telecom switch assumes the role of said primary telecom switch in the event that said primary processing board becomes unavailable, said secondary telecom switch communicating with said bearer traffic network through said primary and secondary redundancy connections and said primary I/O board instead of said secondary I/O board”

In claim 23, last clause, it is stated that

“in the event that said primary processing board becomes unavailable, assuming, at said second telecom switch, the role of said primary telecom switch, said secondary telecom switch communicating with said bearer traffic network through said primary and secondary redundancy connections and said primary I/O board”.

Finally, in claim 45, last clause, it is stated that:

“in the event that said primary processing board becomes unavailable, means for assuming at said secondary telecom switch, the role of said primary telecom switch, said secondary telecom switch communicating

with said bearer traffic network through said primary and secondary redundancy connections and said primary I/O board instead of said secondary I/O board.”

The Higgins et al system includes an optional redundant line card I/O Card 22 and an optional redundant smart line card 32 which the Examiner contends are, in combination, the equivalent of Applicant’s secondary telecom switch.

As stated at Pat. Col. 5, lines 6-7, the line card 32 “communicates with redundant line card I/O card 22 over redundant LC I/O lines 34.” There is no suggestion whatsoever that the Higgins et al card 32 communicates via bus 24 with any one of the line cards 20 of Higgins’ “primary telecom switch 20/26.” In fact, as clearly stated at Pat. Col. 4, lines 64-67, the Higgins et al card 22 is only operative “in the event of a failure of one of the line card I/O cards 20.”

That is, if a primary smart line card 26 should become unavailable, the Higgins et al redundant smart line card 32 would communicate with the bearer traffic network through the line card I/O card 22 via redundant I/O lines 34 and not via redundant bus 24 and any one of the cards 20.

In other words, the availability of the redundant card 22 of the Examiner’s so-called “secondary telecom switch” in the reference is only possible if the line card 20 of the Examiner’s “primary telecom switch” is inoperative or unavailable. Obviously, then, the card 32 could not communicate via an inoperative card 20. In sum, there is no remotest suggestion in Higgins et al that the redundant smart line card 32 communicates with

the bearer traffic network through the redundancy connection and a primary I/O card 20 as opposed to the secondary I/O card 22.

Accordingly and for the foregoing reasons, independent claims 1, 23 and 45, and the claims dependent thereon should be allowed.

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Respectfully submitted,

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